

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|   |   |               |
|---|---|---------------|
| VISHNU VARDHAN NALI,                            | ) |               |
|   | ) |               |
| Plaintiff,                                      | ) |               |
|   | ) |               |
| v.  | ) | No. 25 C 3969 |
|   | ) |               |
| KRISTI NOEM, in her official capacity as        | ) | Judge Rowland |
| Secretary of Homeland Security, <i>et al.</i> , | ) |               |
|   | ) |               |
| Defendants.                                     | ) |               |

**MOTION TO DISMISS**

Defendants, by their attorney, Andrew S. Boutros, United States Attorney for the Northern District of Illinois, respectfully move this court to dismiss this matter for lack of jurisdiction and failure to state a claim. *See* Fed. R. Civ. P. 12(b)(1) and 12(b)(6), respectively. In support of this motion, defendants rely upon the attached memorandum and its referenced declarations.

Respectfully submitted,

ANDREW S. BOUTROS  
United States Attorney

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